

UNITED STATES DISTRICT COURT

DISTRICT OF MASSACHUSETTS

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UNITED STATES OF AMERICA		)	
		)	
v.		)	Criminal No. 04-10031-WGY
		)	
JAMES EDWARD REID		)	
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**GOVERNMENT'S MOTION *IN LIMINE*  
SUBMISSION OF VIDEOTAPED DEPOSITION  
FOR PRE-TRIAL RULING ON OBJECTIONS AND ADMISSIBILITY**

The United States of America submits the accompanying videotapes and transcripts in advance of trial for this Court's review and ruling on objections, and moves this Court for an Order that the accompanying videotapes, as modified by this Court's rulings on objections, may be admitted at trial in lieu of live testimony of Messrs. Pierre Beaudoin and Pierre Lortie.

In support of its submission and motion, the Government submits the following:

1. On January 3, 2006, the Government filed a Motion For Pre-Trial Videotaped Deposition pursuant to Rule 15(a)(1), Fed.R.Crim.P., together with its Memorandum in support of the motion.
2. The Government's motion sought an Order of this Court for the taking of depositions of Messrs. Beaudoin and Lortie in Montreal, Canada.
3. On January 17, 2006, the defendant filed his opposition to the Government's motion.
4. On January 18, 2006, this Court allowed the Government's motion and entered its Order that the depositions be taken with the defendant and defense counsel present.

5. On September 1, 2006, pursuant to Order of this Court, depositions of Messrs. Beaudoin and Lortie were taken at Montreal, Canada, with the defendant and defense counsel present.
6. The depositions were preserved on videotape and have been transcribed.
7. During each of the depositions, counsel from time-to-time interposed objections, as reflected in the videotapes and in the transcripts of the proceedings.<sup>1</sup>

WHEREFORE, the Government submits the accompanying videotapes and transcripts of the depositions of Messrs. Beaudoin and Lortie for this Court's ruling on objections; and

WHEREFORE, the Government moves this Court for an Order that the videotapes, subject to modification pursuant to this Court's rulings on objections, may be admitted at trial in lieu of live testimony of Messrs. Beaudoin and Lortie.

Respectfully submitted this 19<sup>th</sup> day of October, 2006.

MICHAEL J. SULLIVAN  
UNITED STATES ATTORNEY

By: /s/ Victor A. Wild  
VICTOR A. WILD  
Assistant U.S. Attorney

**CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing was served upon Syrie Fried, Esq., Office of The Federal Defender, 408 Atlantic Avenue, Boston, MA. Via ECF.

/s/ Victor A. Wild  
VICTOR A. WILD  
Assistant U.S. Attorney

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<sup>1</sup> To assist this Court, a list of objections has been prepared to identify the transcript page/line and corresponding running time of each videotape at which an objection was made.